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Attorney for Defendant Elizabeth Perez

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BANK OF AMERICA, N.A.; FEDERAL  
HOME LOAN MORTGAGE  
CORPORATION,

Plaintiffs,

v.

COPPER CREEK HOMEOWNERS  
ASSOCIATION, ATC ASSESSMENT  
GROUP, LLC, ELIZABETH PERALEZ, AN  
INDIVIDUAL

Defendants.

ELIZABETH PERALEZ, an individual,  
Counterclaimant,

v.

BANK OF AMERICA, N.A., FEDERAL  
HOME LOAN MORTGAGE  
CORPORATION

Counterdefendants.

Case No.: 2:16-CV-02963-APG-DJA

Dept. No.: I

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSES  
OR OPPOSITIONS TO THE PENDING  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT FILED BY PLAINTIFFS**

**(FIRST REQUEST)**

Elizabeth Perez, (“Defendant or “**Perez**”) by and through her attorney of record, Craig S. Dunlap, Esq.; Plaintiffs, Bank of America, N.A., successor by merger to BAC Home Loans Servicing, LP f/k/a Countrywide Home Loans Servicing, LP (**BANA**) and Federal Home Loan Mortgage Corporation (**Freddie Mac**) (collectively, **Plaintiffs**), by and through their counsel of record, Ariel E. Stern, Esq. and Rex D. Garner, Esq. of the law firm of Akerman LLP; Defendant

1 Copper Creek Homeowners Association (**Copper Creek**), by and through its counsel of record,  
2 Amber M. Williams, Esq. and J. William Ebert, Esq., (collectively the **Parties**) stipulate that the  
3 Parties shall have until and including January 31, 2020, to file responses or oppositions to the  
4 Motion for Partial Summary Judgment filed by Plaintiffs [Dkt. #39] on December 20, 2019.

5 1. This lawsuit involves claims relating to a non-judicial foreclosure by a  
6 homeowner's association conducted pursuant to NRS 116.

7 2. The Parties previously agreed to stay this action pending resolution of legal issues  
8 impacting the claims of the Parties.

9 3. The stay of the action has been lifted and the case is now proceeding.

10 4. The Parties request additional time for briefing.

11 5. Pursuant to Local Rule IA 6-1(a) this is the first request for additional briefing  
12 time. This request is made to allow Defendants additional time to evaluate the Motion for Partial  
13 Summary Judgment and pursue possible settlement of the case. The Parties enter this stipulation  
14 in good faith and not for purposes of needless delay. The Parties therefore request the Court grant  
15 the three-week extension as set forth above.

16 DATED January 8, 2020.

17 **LIPSON NEILSON COLE SELTZER & GARIN**

**AKERMAN LLP**

18 /s/ Amber M. Williams

/s/ Rex D. Garner

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20 J. William Ebert  
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Homeowners Association*

*Attorneys for Plaintiffs*


24 **CRAIG S. DUNLAP, ESQ.**

**IT IS SO ORDERED.**

25 /s/ Craig S Dunlap

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*Attorney for Elizabeth Perez*

  
United States District Judge  
Dated: January 9, 2020.